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March 30, 2022

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

BY ECF

Re: United States v. James Cahill
20 Cr. 521 (CM)

Dear Judge McMahon:

As the Court is aware, defendant James Cahill ("Cahill") is currently at liberty on a fully secured \$500,000 Appearance Bond that contains several conditions including home detention with location monitoring and travel restrictions. By this letter, Cahill respectfully requests permission to spend Easter Sunday (4/17/22) with his family at his son's home in Franklin Lakes New Jersey from 1:30 pm to 8:30 pm (travel included). The exact address of Cahill's son's home has been provided to Pretrial Services ("Pretrial") and the government. The government, by Assistant United States Attorney Jason Swergold, defers to Pretrial's position and Pretrial, by United States Pretrial Services Officer Andrew Abbott, does not consent to this application pursuant to Pretrial's policy not to consent to travel for social reasons as to any defendant on home detention.

Thank you for Your Honor's consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Jason Swergold (by ECF)
AUSA Danielle Sassoon (by ECF)
AUSA Jun Xiang (by ECF)
SAUSA Laura de Oliveira (by ECF)
USPTO Andrew Abbott (by email)